

ROLAND P. MERKEL, P.S.C.

ATTORNEY AT LAW AND MEDIATOR

March 18, 2004

KY Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602-0615

Re: Latko v Taylor County RECC  
Case No. 2003-395

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PUBLIC SERVICE  
COMMISSION

Dear Folks:

Respectfully I request the enclosed *Complainants' Answers to Interrogatories Propounded by Respondent* be filed in the above matter.

Thank you.

Very truly yours,



Roland P. Merkel  
enclosure

Reply to:

- ☒ 332 Capitol Avenue, Frankfort, KY 40601 502/227-1123  
☐ 2333 Alexandria Drive, Lexington, KY 40504 859/263-1123

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION  
CASE NO. 2003-00395**

**IN RE THE MATTER OF:  
CHARLES T. LATKO, JR. and  
LOIS G. LATKO**

**COMPLAINANTS**

**vs.                   COMPLAINANTS' ANSWERS TO INTERROGATORIES  
                          PROPOUNDED BY RESPONDENT**

**TAYLOR COUNTY RURAL ELECTRIC  
COOPERATIVE CORPORATION**

**RESPONDENT**

\*\*\*\*\*

**TO:**   Taylor County Rural Electric Cooperative Corporation  
      c/o Hon. Robert Spragens, Jr.  
      Spragens, Smith & Higdon, P.S.C.  
      15 Court Square  
      P. O. Box 681  
      Lebanon, KY 40033-0681.

Come now the Complainants, and with their Answers to the Interrogatories propounded by the Respondent state:

**INTERROGATORY NO. 1:** Identify each person whom you expect to call as an expert witness at hearing.

**ANSWER:** Complainants do not anticipate calling any expert witness for their direct testimony at this time. However, Complainants will cross-examine expert witnesses presented by the Respondent and reserve the right to call expert witnesses in rebuttal

should same be necessary.

**INTERROGATORY NO. 2:** With respect to each of those expert witnesses identified in your answer to Interrogatory No. 1, state:

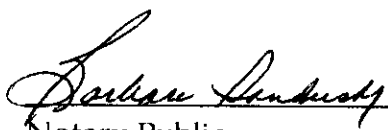
- a. The subject matter on which such expert is expected to testify;
- b. The substance of the facts and opinions to which said expert is expected to testify, and;
- c. A summary of the grounds for each opinion to be rendered by each such expert witness.

ANSWER: N/A.

  
\_\_\_\_\_  
Lois. G. Latko

State of Kentucky    )  
  ) ss:  
County of Taylor    )

The above and foregoing was subscribed, sworn to and acknowledged before me, a Notary Public, this 17<sup>th</sup> day of March, 2004 by Lois G. Latko, known to me to be the identical person who executed this document, and who stated she did so as her own free and voluntary act and deed.

  
\_\_\_\_\_  
Notary Public  
My commission expires: 03 - 04 - 07 \_\_\_\_\_

Respectfully submitted,



Roland P. Merkel  
Roland P. Merkel, P.S.C.  
332 Capitol Avenue  
Frankfort, KY 40601  
(502) 227-1123  
Attorney for Complainants

Certificate of Service

I certify a true copy of the above and foregoing was mailed proper postage prepaid this  
18th day of March, 2004 to:

Hon. Robert Spragens, Jr.  
Spragens, Smith & Higdon, P.S.C.  
15 Court Square  
P. O. Box 681  
Lebanon, KY 40033



Roland P. Merkel